

# **EXHIBIT I**

## Justina K. Sessions

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**From:** Trager, Lara <Lara.Trager@weil.com>  
**Sent:** Thursday, October 13, 2016 4:30 PM  
**To:** Justina K. Sessions  
**Cc:** 'ronnie@hbsslaw.com'; 'swilliams@cpmlegal.com'; Demetrius Lambrinos; 'evelyn@cuneolaw.com'; 'Vicky@cuneolaw.com'; mlundburg@dbcllp.com; drowe@dbcllp.com; Shotzbarger, William; Hemlock, Adam  
**Subject:** Auto Parts - Honda

Dear Justina:

Thank you for speaking with us today, and we look forward to getting back on the phone with you on Monday at 6pm ET. In advance of that call, as we discussed, we thought it would be helpful to provide you some additional information on the current position of the Serving Parties. At this point, and without prejudice to our right to seek all materials subject to the Serving Parties' pending motion to compel, the Serving Parties are seeking the following categories of discovery. On Monday we would like to walk through the categories we were unable to cover today, and continue the discussion about which documents and data exist and what materials Honda is willing to produce. We expect there will be subsequent calls and communications with you over the meet and confer period, and we hope very much to avoid filing a renewed motion to compel. We look forward to talking to you. If you have any questions in advance, please do not hesitate to contact us. Thanks for your cooperation, and kind regards.

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### Purchase and Procurement:

- Purchasing data for defendant and non-defendant suppliers (starting with the lead three parts if less burdensome);
- Data, or documents in the absence of data, reflecting APRs or other price adjustments in isolation from other price elements for all parts, as well as communications/negotiations concerning such adjustments, from select sources;
- RFQ files and all documents associated with each RFQ to the extent reasonably available (e.g., award justification memo); and
- Agreements with auto parts suppliers (including master agreements).

### Cost and Pricing Data and Documents:

- VIN level cost data or, if not tracked at a VIN level, cost data at the least aggregated level this information is tracked, or the most detailed level available for each year, make, model and trim combination, including costs for any options or accessories;
- Data, or documents in the absence of data, sufficient to track each part after it was installed into a vehicle, including model year, VIN, part number;
- Documents from central files and from a small number of custodian's files related to pricing, including back-up materials for internal determinations, internal evaluations, studies, manuals and instructions; and

- Selection from limited number of custodians or central files of internal studies and reports on vehicle cost, vehicle price, the vehicle market, analyses of invoice prices or MSRP, factors that affect cost and any relationship between cost and price.

Sales:

- Data, or documents in the absence of data, sufficient to show the following information for each model (and model year) for each new vehicle sold by the OEM: start of production date, year when sales began, year when sales ended, schedule of base model prices, schedule of MSRP (MSRP for all standard models offered, including base and other standard trim packages), and amounts paid by dealers to the OEMs, including but not limited to, invoice price, dealer invoice price, or factory invoice price;
- Sales data reflecting sales to auto dealers and end-purchasers (including off-invoice payments, incentives, rebates, etc.). If data reflecting off-invoice payments, incentives, rebates, etc. are not available, we request a schedule of off-invoice payments, incentives, rebates, etc. by model that were offered to dealers and end-purchasers; and
- Selection of letters to dealerships announcing invoice and MSRP prices for new models.

Other:

- For all categories requested above, we seek all data and documents that are within your possession, custody, or control, regardless of whether that information came from your own files or the files of a foreign entity or other entity within your corporate family, however we limit the requests to data or documents that pertain only to vehicles sold in the United States regardless of where they were manufactured.

Please note that Auto Dealer Plaintiffs do not join in the request for sales data reflecting sales to end-purchasers or any rebates, incentives or other payments from OEMs to dealers. Also, please note Plaintiffs continue to pursue responsive information regarding Request No. 31.



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